

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
)  
CECELIA N. JOHNSON ) Judge Susan Pierson Sonderby  
)  
Debtor. ) Case No. 09-37011  
)  
) Hearing: October 27, 2009 10:00 AM

**NOTICE OF MOTION**

To: See attached service list

PLEASE TAKE NOTICE that on **October 27, 2009 at 10:00 A.M.**, the undersigned will appear before the Honorable Susan Pierson Sonderby, Bankruptcy Judge, in Courtroom 642, Dirksen Federal Building, 219 S. Dearborn, Chicago, Illinois the Bankruptcy Court for the Northern District of Illinois, Eastern Division, and shall then and there present **MOTION FOR REASSIGNMENT BASED ON RELATEDNESS**, a copy of which is enclosed herewith and served upon you.

/s/ Forrest L. Ingram

Forrest L. Ingram, #3129032  
Forrest L. Ingram, P.C.  
79 W. Monroe St., Suite 900  
Chicago, IL 60603  
(312) 759-2838

**CERTIFICATE OF SERVICE**

I, Philip Groben, a non-attorney, certify that I have served a true and correct copy of the above and foregoing notice and the documents to which it refers on those whose names appear on the attached services list by electronic case filing, or by US Mail, as indicated on the list, on October 13, 2009.

/s/Philip Groben

**SERVICE LIST**

**Via CM/ECF**

**US Trustee**

William T. Neary  
Office of the United States Trustee  
Northern District of Illinois  
219 S. Dearborn St., Room 873  
Chicago, IL 60604

**Via U.S. Mail**

**Debtor**

Cecelia N. Johnson  
6448 S. Eberhart Ave.  
Chicago, IL 60637

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**MOTION FOR REASSIGNMENT BASED ON RELATEDNESS**

NOW COMES the Debtor, **Cecelia N. Johnson** (the “Debtor”), by and through its attorneys at Forrest L. Ingram P.C., and in support of its Motion for Reassignment Based on Relatedness states as following:

1. On October 5, 2009, Debtor and Debtor in Possession filed her petition for Chapter 11 bankruptcy protection.
2. Case # 09-35697, In re My Ranch, Inc. is currently assigned to Judge Jack Schmetterer.
3. Local Bankruptcy Rule 1015(A)(3) defines cases as related if the cases involve persons or entities that are affiliates as defined in 11 U.S.C. § 101(2).
4. Debtor in the instant case is an “affiliate” as that term is defined in 11 U.S.C. § 101(2)(D).
5. The building owned by Debtor houses the store of My Ranch, Inc.
6. Additionally, Debtor is a former majority shareholder of My Ranch, Inc.
7. During formation of My Ranch, Inc., and during a rehabilitation of the store facilities, the Debtor agreed to personally guarantee a number of equipment lease agreements and loan agreements entered into by My Ranch, Inc.
8. The reorganization of Debtor and My Ranch, Inc. are inter-dependant.

9. Accordingly, the instant case is eligible for transfer to Chief Judge Doyle for reassignment as related to Judge Schmetterer.

WHEREFORE, Debtor Cecelia N. Johnson prays that this Court transfer this case to Chief Judge Doyle for Reassignment as Related to Honorable Schmetterer, and for such other and further relief this court deems just.

Respectfully submitted,

Cecelia N. Johnson  
By: /s/ Forrest L. Ingram  
One of its attorneys

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